

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CHRISTIE HARR,

Plaintiff,

v.

WASHINGTON AREA HUMANE SOCIETY,
et al.,

Defendants.

CIVIL ACTION

No.: 2:21-cv-01560-WSH

JURY TRIAL DEMANDED

MOTION TO SUBSTITUTE PARTY

Defendant, The Humane Society of the United States (“Humane Society”), by and through its counsel, Robb Leonard Mulvihill LLP, Bruce E. Rende, Esquire, and William C. Robinson, III, Esquire, files this Motion to Substitute Party, of which the following is a statement.

1. Plaintiff, Christie Harr (“Harr”) commenced this action against various defendants, including the Humane Society of the United States, on November 2, 2021. (ECF 5)
2. Harr’s claims against the Humane Society arise from an allegedly improper and unconstitutional search and seizure operation that occurred on October 30, 2019 involving Harr’s properties. (ECF. 5)
3. In response to various Motions to Dismiss which were filed by a number of defendants, including the Humane Society, Harr filed an Amended Complaint on March 29, 2023. (ECF 91)
4. Harr then filed a First Amended Complaint (*Corrected*) on April 6, 2023. (ECF 92)
5. On September 5, 2024, in response to a number of Motions to Dismiss which were filed by various defendants, including the Humane Society, the Court dismissed Harr’s First Amended Complaint, without prejudice to Harr’s right to file a Second Amended Complaint. (ECF 153)
6. Ultimately, Harr filed a Second Amended Complaint on November 21, 2024. (ECF 159)

7. In response, various defendants, including the Humane Society, have again filed Motions to Dismiss, seeking the dismissal of Harr's Second Amended Complaint. (ECF 172)

8. Harr has not yet responded to those Motions to Dismiss.

9. Recently, the Humane Society changed its name, Humane World for Animals, Inc.

10. Accordingly, Humane Society seeks to substitute Humane World for Animals, Inc. in place of The Humane Society of the United States as the proper party defendant for purposes of this action.

11. Harr has no objection to the substitution and would not be prejudiced by the substitution.

12. No other party to this action has any pending claims against the Humane Society in this action and as such, would also not be prejudiced by the substitution.

WHEREFORE, Defendant, The Human Society of the United States, respectfully requests this Honorable Court grant the requested substitution.

Respectfully Submitted,

ROBB LEONARD MULVIHILL LLP

Dated: February 18, 2025

/s/ Bruce E. Rende

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